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February 17, 2023

VIA ECF

The Honorable Paul A. Crotty
United States District Court of the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Jane Doe v. Cuba Gooding, Jr., No. 1:20-cv-06569 (PAC)*

Dear Judge Crotty:

As directed by the Court on February 13, 2023, the parties respectfully submit this joint letter apprising the Court of the status of this matter and proposing the next steps going forward. Fact discovery closed on October 31, 2022 [ECF #89]. Neither party has given notice of an intent to rely on expert testimony in this case and neither party believes summary judgment is appropriate.

Accordingly, the parties propose that the Court schedule a conference for purposes of selecting dates for commencement of trial, for any other motions the parties may wish to make, and for the final pretrial conference. With those matters scheduled, the parties can turn their focus to preparing the proposed Pretrial Order and associated documents as outlined in Your Honor's Individual Practices, section 8 (F).

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone, Esq.

cc: Casey Wolnowski, Esq.